

**INQUESTS INTO THE DEATHS ARISING FROM
THE FISHMONGERS' HALL AND LONDON BRIDGE TERROR ATTACK**

**SUBMISSIONS ON BEHALF OF THE UNIVERSITY OF CAMBRIDGE
ON A PREVENTION OF FUTURE DEATHS REPORT**

INTRODUCTION

1. These submissions are served on behalf of the University of Cambridge (“the University”) in relation to the possible making of a Report on Action to Prevent Future Deaths (“PFD Report”)¹ by the Coroner and in order to make observations on the points made on behalf of the families of Saskia Jones and Jack Merritt (“the Families”) in their written submissions.² The University has considered the Families’ submissions with care.
2. These submissions on behalf of the University are structured in three main parts, as follows:
 - a. Consideration of the Submissions made on behalf of the Families (paragraphs 5 to 6).
 - b. Consideration of actions taken by the University (paragraphs 7 to 28). The University has taken a series of actions following the events at Fishmongers’ Hall and in light of the matters raised at the inquests of Saskia Jones and Jack Merritt (“the Inquests”) and subsequently. These include:
 - i a pause of the work of Learning Together (“LT”), which continues to be in place;
 - ii the completion of three pieces of work designed to consider different aspects of LT;

¹ Under paragraph 7 of Schedule 5 to the Coroners and Justice Act 2009 and regulation 28 of the Coroners (Investigations) Regulations 2013

² Written Submissions of the Family of Miss Saskia Jones on Matters for Regulation 28 Report on Action to Prevent Future Deaths, 29 June 2021; and Submissions on behalf of the Family of Jack Merritt: Prevention of Future Deaths, 30 June 2021. They are abbreviated in these Submissions to “SK Family Submissions” and “JM Family Submissions” respectively.

- iii the establishment of a Transition Board to consider the future of LT, whether it can continue within the University at all and (if so) when the current pause of its work can be lifted (and references below to whether or not LT will continue relate to its continuation with the University);
 - iv a review of the University’s relevant health and safety and risk assessment policies and guidance; and
 - v liaison with Her Majesty’s Prison and Probation Service (“HMPPS”) / the Ministry of Justice (“MOJ”), which includes a review of existing LT policies and documentation relating to its work within prison and possible ongoing contact with former prison-based students in the community.
- c. The University’s submissions about a PFD Report (paragraphs 29 to 34).
3. LT began in 2014. Dr Amy Ludlow and Dr Ruth Armstrong are its co-founders and Directors. The LT Programme now provides education to both Cambridge students and prisoners. Students would typically meet to study with each other within the prison environment. As the Inquests heard, LT also involved community-based activity, including educational events, such as academic conferences and knowledge exchange events. In 2019, the LT Programme was offering a curriculum of 15 different courses from different disciplines across three partner prison sites each year. An informal network of LT partnerships (“the LT Network”) formed outside the University of Cambridge structure and in 2019, there were 26 partnerships between prisons and universities in the UK, teaching over 700 students.
 4. LT is based within the Institute of Criminology of the University (“the Institute”). The Institute is a department within the Faculty of Law, which in turn sits within the School of Humanities and Social Sciences.³ The University was accorded Interested Person status in the Inquests as the body responsible for the LT Programme.⁴ The Council, which is the executive and policy-making body of the University and whose members constitute the charity trustees of the University, will make decisions as to the future of LT. It will do so in conjunction with the General

³ Professor Loraine Gelsthorpe, WS5071/1

⁴ First Ruling on Case Management and Directions, 5 June 2020, paragraph 18(i)

Board, which is responsible for the academic and educational policy of the University.

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5. The Families raise important points for consideration. In broad terms, they include the following: (a) the extent to which the lessons arising from the events at Fishmongers' Hall on 29 November 2019 have been properly learned and the need for change considered;⁵ (b) the evaluation of LT⁶ and, ultimately, its continuation;⁷ and (c) risk assessment processes both inside prison and in the community.⁸ This latter consideration reflects in part the conclusion of the jury in the Inquests in connection to Question 5 (concerning organisation and security measures for the event at Fishmongers' Hall) and particularly one of the points in explanation for their conclusion, namely: "*Failure to complete event specific assessment by any party*". The Families' submissions also include specific concerns such as the extent to which LT has properly considered category exclusion, e.g. of TACT prisoners or ex-offenders, from its programmes and events;⁹ and (d) processes for sharing information between LT, authorities such as HMPPS, and venues.¹⁰

6. The University has given considerable thought to these and other points and continues to do so. We provide an explanation below of the relevant work that has been done, is underway and is planned for the future by the University. We then come on to make submissions concerning a PFD Report. The University has committed to reaching definitive decisions about the future of the LT by the end of 2022 at the latest, with a preliminary decision taken no later than 13 December 2021 as to whether LT should continue to be part of the University.

⁵ e.g. JM Family Submissions 3

⁶ e.g. JM Family Submissions 4

⁷ e.g. SK Family Submissions 56-57 but see JM Family Submissions 2

⁸ e.g. SK Family Submissions 9-10 and 52-53

⁹ JM Family Submissions 5

¹⁰ SK Family Submissions 11-12 and 54-55

ACTIONS TAKEN BY THE UNIVERSITY

Learning Lessons

7. Drs Ludlow and Armstrong gave evidence at the Inquests about the University's internal process of reflection, its establishment of an advisory group and instruction of a strategic advisor.¹¹ They also spoke about the pause of LT's activities. Dr Armstrong explained that the pause remains in place now, in part so that the University can learn from the evidence given at the Inquests.¹² Dr Ludlow agreed that LT has work to do in improving its risk assessment and management procedures, work which had already started by the time of the Inquests hearing.¹³ When asked what she hoped to learn from her involvement in the inquest hearing, Dr Armstrong stated: "*I hope...we can learn what happened and learn the lessons of how to make sure we keep making chances for good for people and do so in a way that absolutely minimises the risk of ill*".¹⁴
8. The University and the Directors of LT are concerned that the Families take the view that there has been no serious consideration about the future of LT in the wake of the tragic events at Fishmongers' Hall and in particular that there is an intention to keep LT in the same form as it was at the time of Saskia's and Jack's deaths.¹⁵ That is very much not the case, as evidenced below. The personal and professional reflection of the Directors of LT and of the Director of the Institute is deep and ongoing and includes a commitment to change and improvement. They, and the University, all consider that it is necessary to learn the lessons flowing from the events at Fishmongers' Hall. That learning will in turn inform the final decisions about the future of LT.

The pause of LT's activities

9. Since November 2019, all courses, events and other meetings organised by the LT Programme which bring together University staff, students, former students and visitors with those in prison or under criminal justice supervision in the community have been paused. That pause remains in place and will only be lifted if the

¹¹ e.g. WS5028/21

¹² Dr Ruth Armstrong, T/9/141

¹³ Dr Amy Ludlow, T/8/119

¹⁴ Dr Ruth Armstrong, T/9/142

¹⁵ JM Family Submissions 3

University's Council, using the mechanisms identified below, is satisfied that the risk of harm will be adequately and effectively managed. One of the objectives of the University's Transition Board, to which we return below, is to advise the Council on whether and, if so when, the pause can be lifted, whether in whole or in part.

10. The pause means:

- a. the activities giving rise to the risks considered during the Inquests and identified by the Families in their submissions are not currently taking place and, therefore, whilst the pause remains in place, the risks do not exist;
- b. the University has put in place mechanisms to consider if the pause should be lifted and, if so, to what extent; and
- c. no final conclusion has yet been reached about the future of the LT Programme.

Work completed by the University

11. Following the tragic events of 29 November 2019, the University has completed three pieces of work designed to consider different aspects of the LT programme and has done so in collaboration with its Directors.

- a. **The Reflection Group Report:** the Reflection Group was asked to make recommendations to the Council and the General Board on the safety and wellbeing of students and staff who participate in the LT Programme; on the contribution of the LT Programme to the mission of the University; and on the future organisation of the LT Programme. The Group reported in March 2020 and made two sets of recommendations. The first was to establish an advisory body to advise on the further development of the LT Programme's safeguarding and risk assessment processes and to sign them off. The second was to appoint an interim Chief Executive for a year whose principal responsibilities would be to oversee operational matters; to line manage, guide and mentor its Directors; and to help to steer the strategic development of Learning Together.
- b. **The Advisory Body's Report:** the Council subsequently established an Advisory Body to take forward the first set of recommendations from the

Reflection Group. It reported earlier this year, and its recommendations were subsequently endorsed with further strengthening by the Health and Safety Executive Committee of the University. The report makes detailed recommendations on risk assessment, management and governance for the LT Programme.

- c. **The Strategic Advisors' Report:** following careful consideration of the Reflection Group's report, the Council decided that the Group's second recommendation should be divided into two sequential parts, the first being the creation of an advisory role to consider the future of the LT Programme. The second part is the appointment of an Executive Director or equivalent.¹⁶ Accordingly, to progress the first part, the Council agreed that the Vice-Chancellor (the principal academic and administrative officer of the University) and the Head of the School of Humanities and Social Sciences should commission a Strategic Advisors' Report. The Strategic Advisors, from an independent external education charity, were asked to make recommendations relating to the future of the LT Programme and the LT Network, including the most suitable host institution and the appropriate legal and governance structures. Their report was delivered earlier this year and sets out a sequence of questions, with supporting commentary, for the University to consider. It also sets out a series of suggested timelines, milestones and decision points. The report's requirements, if the LT Programme is to continue, include effective oversight of the LT Programme's leadership and activities, appropriate challenge and support to the leadership and effective control over the LT Programme's activities.

The Transition Board

12. In light of the background above, the General Board and the Council recently established a Transition Board. The Transition Board will have an experienced and senior membership comprising a Chair from within the collegiate University; a member of the Council; an academic from within the University with relevant expertise; at least one external member with expertise working with offenders and

¹⁶ This part has not been pursued given the establishment of the Transition Board (see paragraphs 12-17). However, it is open to the Board to progress this proposal should it consider such an appointment to be appropriate in light of its views about the future of LT.

ex-offenders; and a member, external or from within the University, with substantial expertise relating to health and safety and risk assessment.

13. The first objective of the Transition Board is to undertake the deliberations and preparations necessary in order to make definitive recommendations as to whether to re-establish the LT Programme within the University or to support its launch as a separate entity outside the University. The Transition Board will also consider the future of the LT Network. It will be guided principally by the Strategic Advisors' Report, and also by the Advisory Body's Report and subsequent work. The Transition Board will make its recommendations in two phases. The first will conclude no later than 13 December 2021 and will concern the continued viability of the LT Programme as part of the University. This first phase will cover a number of different areas, including:
 - a. whether activity should be restricted to taking place only in prisons, or whether (and, if so, in what form) it should also continue in the community;
 - b. whether there should be any exclusion from LT activities of individuals who have been convicted under the Terrorism Act 2000 (TACT offenders) or any other exclusions (e.g. by conviction type, security category etc). The University therefore recognises and is considering the points raised concerning category exclusion in the JM Family Submissions;¹⁷
 - c. what information LT should receive about current and former prison based students to inform its risk assessment process (recognising that this may be affected by the willingness/ability of third parties to share relevant information with LT); and
 - d. how, if LT continues to be active in the community in some form, information about attendees at LT events should be shared with the venue proprietors.
14. In the second phase, the Board will develop proposals for a transition plan for the transformation of LT from its current form to its recommended new form. This phase will be delivered no more than 12 months after the decision is taken on phase one and will therefore be completed by the end of December 2022 at the latest. It is

¹⁷ At 5(b), 5(e) and 5(g)

open to the Board to take a different course, subject to the approval of the Vice-Chancellor. For example, if the Board recommends that LT should no longer be part of the University, it may also recommend that the subsequent transition phase is better done outside the University.

15. The second objective of the Transition Board is to advise the Council on whether, and if so when, the pause can be lifted, whether in whole or in part. It will be open to the Board to consider a partial lifting – for example, the Board may wish to oversee a trial of certain activities within a prison setting – or to advise that there should be no lifting. Approval to lift the pause, in whole or in part, must be obtained from the Council, and such approval should only be sought if the Transition Board can provide assurance to the Council that the risk of harm will be adequately and effectively managed.
16. The third objective of the Transition Board is to oversee and provide constructive challenge to the work the Directors of LT until the end of the second, transition, phase (above). This will entail, for example, the identification of a suitable line manager to whom the Directors will be responsible on a day-to-day basis, recognising it is important that governance and management responsibilities are not blurred. The Board will be expected to work closely with the Directors, who will undertake work to support the Board. However, the Board’s recommendations will be its own.
17. Accordingly, the University now has in place:
 - a. detailed mechanisms and procedures for consideration of, and definitive decisions about whether LT has a future and, if so, in what form;
 - b. a phased decision making process taking into account a wide range of matters, including the principal points raised on behalf of the Families in their PFD Submissions; and
 - c. a deliberative decision making process which will result in concrete actions being taken in relation to the future of LT and which will be completed in the course of 2022. During this time, the pause on LT’s activities with those in prison or under criminal justice supervision in the community will remain in

place unless the University's Council is satisfied that any risk of harm will be adequately and effectively managed.

Health and safety review

18. In parallel with the work of the Transition Board, the University is conducting a review of its relevant health and safety procedures, and HMPPS/MOJ and LT are working on the improvement of relevant procedures and information sharing. We consider the health and safety review first and come on then to consider the work taking place between HMPPS/MOJ and LT.

19. The University's Health and Safety Executive Committee and the Registry (the Head of the University's Unified Administrative Service) have commissioned a review of the University's Health and Safety Policy and the underlying relevant procedures and guidance, focussing particularly on event-specific risk assessment and on work with offenders and ex-offenders, whether taking place as part of the LT Programme or outside it. The review builds on and seeks to improve the University's *Health and Safety Policy; Guidance on Managing Risks from Travel, Fieldwork and Work Away*, which has been in place since January 2019; and *Guidance for all organisers of activities: Events, Festivals, Outreach Programmes, School Visits, Public Engagements*, which has been in place since 2017. Furthermore, the University is now establishing dedicated health and safety documentation, which will either take the form of a Policy or Guidance, to address working with people who have offended. This new documentation will address the safety risks which may arise in such circumstances and is being created with specialised input from an external, expert organisation, NACRO.

20. The University will be asked to approve final versions of the above documentation during Autumn 2021, with implementation from 1 January 2022. The new documentation will be disseminated by the University's Safety Office to all Heads of Department/Institution, Departmental Administrators and Departmental Safety Officers. The University will provide specific training if appropriate (see further below), and there will be further support from the Safety Office in the form of tool kits, further information on the existing 'near miss' reporting procedures and ongoing advice, with input from external specialists if required.

21. Heads of Department/Institution are responsible within their own domain for implementation of University Health and Safety Policy. In addition, the Head of Department/Institution must set out their own organisational arrangements for safety and must prepare a Departmental Safety Policy which, together with the University Health and Safety Policy, fulfils the requirement under Section 2(3) of the Health and Safety at Work Act 1974. To discharge this duty, the Institute has its own health and safety policies. The Institute draws on the University's policies and guidance and applies them to the specific circumstances of its own work. The Institute is conducting a review of its own policies (and will conduct a further review when the work of the University, above, is complete, and will also introduce further refinements to the Institute's risk assessment procedures to maximise compliance by staff and students). The Institute's review has included further development of its Risk Assessment Form for Research Fieldwork and Other Activities, which now expressly applies to external events of the type held at Fishmongers' Hall.
22. Both the University and the Institute are re-considering their provision of training concerning health and safety generally and risk assessment in particular in light of the above reviews. This is likely to include bespoke training, sourced from specialist external providers, to cover certain identified areas such as working with people with criminal convictions in prisons and on license in the community. In the meantime, the Institute is introducing a series of facilitated discussions involving all academic and administrative staff and PhD students, with the purpose of embedding the need to consider risk more deeply.
23. The University has therefore recognised the need to review its overarching approach to health and safety and risk assessment to reflect its learning from the events at Fishmongers' Hall and, as a result, it is taking significant and concerted action to build on and strengthen these policies and procedures. This review is ongoing and is operating on different levels, on a University-wide basis and also within the Institute. Once these reviews are complete, should the LT Programme continue within the University, all newly strengthened policies and procedures will be reflected within LT's own policies and processes and documentation.

Liaison with HMPPS/MOJ

24. As the Inquests heard, there has been continued collaboration between LT and HMPPS/MOJ since the events at Fishmongers' Hall.¹⁸ That engagement has been in connection with the establishment of toolkits to support best practice in delivery and evaluation and discussion to agree a strategy of effective communication and dissemination of information. In her oral evidence, Dr Armstrong suggested it would be helpful to have a memorandum of understanding by which LT would set out explicitly the nature of the LT activity to take place "*and that we expect communication of any risks that are relevant, and I think we could include in that something like a check box that says 'Has there been any intelligence about this person?'*".¹⁹
25. Work has continued following the Inquests. The current Directors of Learning Together have been in discussion with the MOJ's Head of Prisoner Outcomes in this regard. It is the intention that HMPPS and LT staff will review existing LT policies and documentation relating to its work within prisons and possible ongoing contact with former prison-based students in the community. They will consider appropriate policies and documentation across the LT Network ("the Toolkit"). Subject to the overriding work of the Transition Board, it is LT's intention specifically to consider frameworks for: (a) governance between HMPPS and universities delivering prison and university partnerships, including an articulation of responsibilities between institutions; (b) risk assessment of partnership activities in prison, to include recruitment decision making and processes for dynamic information sharing and reassessment of risk during activity; and (c) risk assessment of partnership activities and events in the community, to include the identification and sharing of relevant information between HMPPS and university partners and/or host venues – the aim would be to ensure there is a structured and dynamic information sharing system, with resulting information feeding into risk assessment.
26. This is in the context of wider work by HMPPS/MOJ currently underway on improving prisoner education, in relation to which the LT Network is amongst

¹⁸ WS5029/26-27; WS5028/21-22

¹⁹ T/9/107; see, to similar effect, Dr Ludlow's evidence at T/8/146-147

those being consulted. Therefore, LT and HMPPS/MOJ aim to create a set of processes for prison and university partnership working that are not only informed by best practice in comparable activity across prisons and in the community but which also take into account the wider prisoner education work currently taking place.

27. The Directors of LT will wish to discuss with HMPPS/MOJ the creation of a memorandum of understanding between LT and the wider LT Network with HMPPS/MOJ governing information sharing in the following broad categories:

- a. by LT to HMPPS about LT's prison-based programmes and also, as appropriate, activity in the community;
- b. by HMPPS to LT of relevant information about prisoners cleared by HMPPS to participate in LT prison-based programmes or, as appropriate, on release in the community; and
- c. by LT and/or HMPPS/MOJ to venue operators.

28. LT and HMPPS/MOJ are accordingly considering matters of considerable importance concerning the future operation of LT and prison and university partnerships more broadly. The scope of discussions reflects matters of concern identified at the Inquests and subsequently raised on behalf of the Families in their Submissions. Furthermore, this stream of work is subject to the work of the Transition Board and to decisions the University ultimately reaches about the future of LT.

SUBMISSIONS

29. If the Coroner concludes that: *“anything revealed by the investigation gives rise to a concern that circumstances creating a risk of other deaths will occur, or will continue to exist, in the future”* and in the Coroner's opinion *“action should be taken to prevent the occurrence or continuation of such circumstances, or to eliminate or reduce the risk of death created by such circumstances”*, the Coroner *“must report the matter to a person who the coroner believes may have power to*

take such action".²⁰ In short, the power and duty to make a PFD Report only arise where the Coroner forms the opinion, based on his inquiry, that particular risks of death exist for which preventative action is required.²¹ The University's submissions focus on these matters.

30. The Coroner may properly decide not to make a PFD Report on an issue on the basis that he is satisfied that no further action is necessary. If, for example, it appears that a risk or issue has been addressed by action of some kind, or if circumstances have changed substantially since the deaths in question, the Coroner may reasonably say he is satisfied that no further action is required.²²

31. The Chief Coroner has provided guidance in relation to the making of PFD Reports,²³ which includes that the Coroner, in considering whether there is a duty to make a report, should focus on the current position; that there may be no need to make a report where a potential PFD Report recipient has already implemented appropriate action to address a risk of future fatalities; and that the question of whether a PFD Report is required in circumstances where action is ongoing and not yet fully implemented will be *"highly fact sensitive, depending upon the circumstances of each individual case. Relevant factors may include the nature of the commitment to take action, any evidence in support of it, and the coroner's assessment of the organisation's understanding of, and commitment to addressing, the area of concern"*.²⁴

32. It is submitted that risks of death do not currently exist in relation to the work of LT or the wider University for the following reasons:

²⁰ Coroners and Justice Act 2009, Schedule 5, paragraph 7(1)

²¹ HHJ Lucraft QC, PFD Report dated 1 November 2019 in the Inquests arising from the deaths in the London Bridge and Borough Market Terror Attack, paragraph 22(b)

²² See, e.g., HHJ Lucraft QC, PFD Report dated 1 November 2019 in the Inquests arising from the deaths in the London Bridge and Borough Market Terror Attack, paragraph 22(d); Written Submissions of Counsel to the Inquests on Determinations and Directions to the Jury, 21 May 2021, at 80(d)

²³ Chief Coroner's Guidance No. 5 Reports to Prevent Future Deaths, revised 4 November 2020 by HHJ Lucraft QC; at <https://www.judiciary.uk/wp-content/uploads/2020/11/GUIDANCE-No.-5-REPORTS-TO-PREVENT-FUTURE-DEATHS.pdf>

²⁴ Paragraph 7. Whether the duty to issue a PFD Report arises is highly fact-specific, and involves an exercise of judgment by the Coroner, *R (Iroko) v HM Senior Coroner for Inner South London* [2020] EWHC 1753 (Admin) at [58].

- a. The continuing pause on LT's work means that activities giving rise to possible risks considered during the Inquests and identified by the Families in their submissions are not currently taking place and the risks therefore do not exist. The pause remains in place and no final decision has yet been reached about LT's future.
 - b. Furthermore, the specific risks associated with Usman Khan's automatic release from prison at a point prior to the end of his custodial term have been addressed in the case of other terrorist offenders, following a change in the law. The purpose of the Terrorist Offenders (Restriction of Early Release) Act 2020 is to ensure that terrorist offenders are not automatically released before the end of their custodial term without agreement of the Parole Board.²⁵ Of course, concerns arising from the Inquests go beyond this particular point, as is clear from the actions the University is taking.
33. It is further submitted that in any event preventative action is not required. The major 'root and branch' review process under way by the University, and considered above (at paragraphs 7 to 28), takes into account learning points arising from the Inquests, and the University will continue to reflect upon them at each stage of the work. That action includes a comprehensive and painstaking review in light of all of the evidence given and the jury's verdict in these Inquests. Indeed, the learning points from the Inquests, and the consequent action taken or being taken by the University, go beyond the scope of matters which may be addressed by a PFD Report. In short, the University has identified the key areas of concern and has in place considered and credible processes for definitively addressing them.
34. The University responds to the Families' Submissions as follows:
- a. **HMPPS security sifting and risk assessment in relation to LT courses in prison and the possibility of continued engagement post-release** (SK Family Submissions SJ MC2/R2 9-10, which are addressed to HMPPS, and JM Family Submissions 5(b)). There will be no resumption of LT's activities until clear, agreed processes are in place between LT and HMPPS (properly reflected within LT's own policies and other relevant documents) governing risk assessment and

²⁵ Explanatory Note, paragraph 1. Section 1 of the Act amends the Criminal Justice Act 2003 accordingly.

information sharing, including in circumstances where there is the possibility of ongoing contact in the community following the completion of an LT course in prison (see paragraphs 25-27, above).

- b. **Category etc exclusion** (JM Family Submissions 5(b), 5(e) and 5(g)). The University is considering whether LT should continue and, if so, in what form and to what extent. This comprehensive review expressly *includes* consideration of exclusion from participation in LT activities on the basis of category of offence or on other grounds (see paragraph 13(b), above).
- c. **LT-HMPPS information sharing system in relation to working with prisoners in the community** (SJ Family Submissions MC3/R3 11-12, which are addressed to HMPPS). The University sees the force of this suggestion, which is based in part on the evidence of Dr Armstrong. As already stated, there will be no resumption of LT's activities until clear, agreed processes are in place between LT and HMPPS (properly reflected within LT's own policies and other relevant documents) governing risk assessment and information sharing (see paragraphs 25-27, above).
- d. **LT/University risk assessment for events to be attended by offenders** (SJ Family Submissions MC23/R23 52-53, which are addressed to LT, and JM Family Submissions 5(h)). The University's review of the future of LT expressly *includes* whether LT activity should be restricted to taking place only in prisons, or whether (and, if so, in what form) it should also continue in the community. Separately, discussions are ongoing between LT and HMPPS/MOJ concerning risk assessment and information sharing in relation to community activities and events. And, in any event, the University's review of its relevant health and safety policies expressly includes the creation of dedicated University health and safety documentation to address working with people who have offended (see paragraphs 13(a) and 25-27, above).
- e. **LT provision of information to venues where convicted offenders are invited to attend events** (SJ Family Submissions MC24/R24 54-55, which are addressed to LT). The University's review of the future of LT expressly *includes* not only what information LT should receive about current and former prison

based students to inform its risk assessment process but also how, if LT continues to be active in the community in some form, information about attendees at LT events should be shared with the venue proprietors. Separately, LT discussions with HMPPS/MOJ will include the identification of relevant information and procedures for sharing it between HMPPS and university partners and/or host venues (see paragraphs 13(c)-(d) and 25-27, above).

- f. **Continuation of LT/its current leadership** (SJ Family Submissions MC25/R25 56-57 addressed to LT). The future of LT, its continued existence and future form is the subject of the detailed processes outlined above. The University has put in place mechanisms to consider whether the pause should be lifted and, if so, to what extent. No final conclusion has yet been reached about the future of LT (see paragraphs 12-16, above).

CONCLUSION

35. In all of the circumstances, it is submitted that the Coroner should properly decide not to make a PFD Report covering issues concerning LT and the University. Further action is not necessary in circumstances where the work of LT bringing together University staff, students, former students and visitors with those in prison or under criminal justice supervision in the community is not currently taking place and risks potentially arising from it do not exist. A decision as to whether LT will remain part of the University will be taken no later than 13 December 2021 within the framework carefully established for that purpose. In addition, the University's review process, which extends beyond LT to health and safety and risk assessment more widely across the University is robust, credible and demonstrates the University's commitment to addressing in full the concerns arising from the tragic events at Fishmongers' Hall.

NICHOLAS GRIFFIN QC
PHILIP STOTT

QEB HOLLIS WHITEMAN

28 July 2021